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1 Matthew B. Hippler (SBN 7015) Tamara Reid (SBN 9840) 2 HOLLAND & HART LLP 5441 Kietzke Lane, Second Floor 3 Reno, Nevada 89511 Phone: 775-327-3049 Fax: 775-786-6179 mhippler@hollandhart.com treid@hollandhart.com 6 Attorneys for Plaintiff 7 UNITED STATES DISTRICT COURT 8 DISTRICT OF NEVADA ACH FOAM TECHNOLOGIES, INC. (f/k/a Case No. 3:18-cv-00034-MMD-WGC ACH HOLDINGS, INC.), a foreign corporation, 11 Plaintiff, STIPULATION FOR EXTENSION OF TIME TO OPPOSE 12 **MOTION TO DISMISS** ICON RENO PROPERTY OWNER POOL 3 [First Request] NEVADA, LLC, a foreign limited liability 14 company; DOES 1 through 10; and ROE CORPORATION 1 through 10, 15 Defendants. 16 Plaintiff, ACH Foam Technologies, Inc. (f/k/a ACH Holdings, Inc.) ("ACH"), and 17 Defendant, ICON Reno Property Owner Pool 3 Nevada, LLC ("ICON"), hereby submit this 18 Stipulation for Extension of Time to Oppose Motion to Dismiss 19 1. ICON filed its Motion to Dismiss for Lack of Subject Matter Jurisdiction [ECF 11] 20 (the "Motion") on March 9, 2018. 21 2. ACH's opposition to the Motion is due March 23, 2018. Additional time is needed 22 for ACH's counsel to complete the document review required to prepare ACH's opposition to 23 the Motion as well as due to other matters requiring ACH's counsel's attention. 24 3. This is the first request for an extension, and this request is not for the purposes of 25 26 delay.

4. The parties agree that ACH shall have to, and including, April 4, 2018 to oppose the Motion.

DATED this 21st day of March, 2018.

/s/ Matthew B. Hippler

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ORDER

IT IS SO ORDERED

UNITED STATES MAGISTRATE JUDGE

DATED: ____ March 22, 2018